

ILN NORPLEX, INC.
INDUSTRIAL LAMINATES/NORPLEX, INC.
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3 April, 2001

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APR 09 2001
RESP

CERTIFIED MAIL

Return Receipt Requested

Article No: 7099 3220 0009 7147 0693

Kori Kuehl
ARTD/RESP
U.S. Environmental Protection Agency
901 N. 5th Avenue
Kansas City, Kansas 66101

Dear Mr. Kuehl:

As requested, this is a response to the letter of warning/request for information resulting from September 28, 2000 RCRA inspection by the EPA of the Industrial Laminates/Norplex facility in Postville, IA. All questions were answered by myself. I have done my best to answer your request for information regarding the three violations. If you have any questions please feel free to contact me at (319) 864-4227.



Scott Loven
HS & EQ Manager



00181264
RCRA RECORDS CENTER

Information request #1

The job title for each person at the facility related to hazardous waste management is as follows:

Job title	RCRA job description
HS&E Manager	Responsible for training employees who may be involved in creating, storing, or handling hazardous waste while working at the plant. Also responsible for training personal for contingency response including spills and fire. Oversee the plants RCRA compliance. Oversee the storage and shipment of all hazardous materials at/from the plant.
Receiving	Applies shipping labels to hazardous waste drums, moves drums to 90-day storage area, loads truck for hazardous waste shipments. Assists HS&E manager in inspection of stored hazardous waste.
Treater II Operator	The treater operator may be asked to place spent production chemicals into hazardous waste drums. He/she may assist in the maintenance of the satellite accumulation and 90 day storage areas. May assist in spill response in the treater area. May place label/accumulation date on drum as appropriate? Ancillary training includes respirator usage, and hazardous communications.
Treater Lead	Oversees placement of spent production chemicals into hazardous waste drums. He/she oversees the maintenance of the treater satellite accumulation and 90 day storage areas, as well as hazardous waste spill response in the plant area. Oversees placement of label/accumulation date on drum as appropriate. Ancillary training includes incipient fire response, respirator usage, and hazardous communications.
Treater I Operator	Places spent production chemicals into hazardous waste drums. He/she maintains the satellite accumulation and 90 day storage areas. Would respond to spill's in the treater area. May place label/accumulation date on drum as appropriate? Ancillary training includes respirator usage, and hazardous communications. May also include incipient fire response training if on the emergency response team.
Compounder	The compounder mixes batches of chemicals for production purposes. He/she supervises the unloading of chemicals delivered to the work site, properly stores hazardous waste drums, collects spent solvents from the cleaning process, and responds to spill emergencies. May place label/accumulation date on drum as appropriate? Ancillary training includes respirator usage, and hazardous communications. May include incipient fire response if on the emergency response team.

Information request #1 continued

Name of the employee filling the job.

HS&E manager	Scott Loven
Receiving	Daryl Szabo, Dennis Hesse
Treater II Operator	Bruce Gullickson, Jeremy Hilgersen, Roger Huinker, Kathy Johanningmeier, Lorna Jones, Paul Kuesner, Dan Liebold, Terry Mc Nally, Nancy Radloff,
Treater lead	Greg Larkin, Jerry Bissell, Melita Miller
Treater I Operator	Darrin Walch, Al Meyer, Roger Winters
Compounder	Greg Larkin, Jerry Bissell, Melita Miller

Information Request # 2

Written description of the amount of both introductory and yearly refresher RCRA training.

HS&E manager	<u>Introductory training:</u> Within 6 months of starting position, attend an off-site course that covers the following RCRA hazardous waste topics: Overview, solid & hazardous waste identification, generator requirements, site management, RCRA compliance and enforcement, prevention, hazardous waste/materials transportation requirements, training requirements, packaging, emergency response.
HS&E manager	<u>Continuous training:</u> Yearly attend a course and/or review training material similar to that required for introductory training.
Treater II Operator Treater I Operator Treater lead Receiving	<u>Introductory training:</u> New employees, or others transferred into a job that includes working with hazardous waste shall receive training to ensure compliance with 40 CFR 264.16. This training shall be completed within 6 months of being placed in that position. At a minimum training shall include: <ol style="list-style-type: none">1. Overview of RCRA and how it applies to Norplex hazardous waste.2. Typical makeup of Norplex production chemicals and when and why they would become hazardous waste.3. Health hazards associated with handling Norplex materials including hazardous waste.4. Norplex procedure for handling hazardous waste, hazardous waste drum storage and accumulation locations, drum labeling requirements, and shipping requirements.5. Rules covering 90-day storage, and satellite accumulation labeling.6. Response to spills, including hazardous waste.7. Response to fires that may include hazardous waste materials.
Treater II Operator Treater I Operator Treater lead Receiving	<u>Continuing training:</u> The HS&E Manager after a review of 40CFR 262.xx shall on a yearly basis conduct continuing training. At a minimum training shall include a review of: <ol style="list-style-type: none">1. Overview of RCRA and how it applies to Norplex hazardous waste.2. Typical makeup of Norplex production chemicals and when and why they would become hazardous waste.3. Health hazards associated with handling Norplex materials including hazardous waste.4. Norplex procedure for handling hazardous waste, hazardous waste drum storage and accumulation locations, drum labeling requirements, and shipping requirements.

	<ul style="list-style-type: none"> 5. Rules covering 90-day storage, and satellite accumulation labeling. 6. Response to spills, including hazardous waste. 7. Response to fires that may include hazardous waste materials.
Receiving- Hazardous waste shipment	In addition to the above listed training New and continuous training will include instruction in the preparation of hazardous waste drums for shipment off site.

Information Request # 2 continued.

Information Request # 3

These drums were marked with the accumulation start date immediately prior and subsequent to the inspection. The Norplex employee responsible for this operation has been instructed to not obliterate the temporary hazardous waste label and accumulation start date until after the hazardous waste shipping label has been applied, and the original accumulation date has been transferred to that label.